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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

Case No: 2:20-cr-00308-JAD-DJA

13 vs.

Stipulation for a Protective Order

14 STEPHEN THOMAS PARSHALL,

15 Defendant.

16
17 The parties, by and through the undersigned, respectfully request that the Court issue an
18 Order protecting from disclosure to the defendant Stephen Thomas Parshall, the public, or any
19 third party not directly related to this case, any and all unredacted discovery (the “Protected
20 Material”) in this case. The parties state as follows:

21 1. On November 10, 2020, a grand jury returned an indictment charging Parshall
22 with two counts of *Sexual Exploitation of Children*, in violation of 18 U.S.C. §§ 2251(a) and (e),
23 regarding VICTIM 1 and VICTIM 2, one count of *Coercion and Enticement*, in violation of 18
24 U.S.C. § 2422(b), regarding VICTIM 2, and one count of *Receipt and Distribution of Child*

1 *Pornography*, in violation of 18 U.S.C. §§ 2252A(a)(2) and (b)(1).

2 2. The trial is currently set for November 1, 2022.

3 3. The government has already produced redacted discovery in excess of 831 Bates-
4 stamped items to defense counsel. Some of the Bates stamped items contain multiple files (*i.e.*,
5 Bates stamp 679 was a copy of a file that included 7 links to messages sent between Parshall
6 and other users from Kik). The previously produced discovery included redacted transcripts of
7 recorded interviews with VICTIM 1 and VICTIM 2. The video recorded interview of
8 VICTIM 1 and the audio recorded interview of VICTIM 2 have been available for defense's
9 inspection at his request.

10 4. The defendant, Stephen Thomas Parshall, has access to review and obtain copies
11 of all the redacted discovery produced by the government to defense counsel, including the
12 redacted transcripts of interviews with VICTIM 1 and VICTIM 2.

13 5. Defense counsel has requested that the government produce unredacted copies of
14 the video recorded interview of VICTIM 1 and the audio recorded interview of VICTIM 2 in
15 preparation for trial. The unredacted interviews include personal identifying information of the
16 victims.

17 6. In order to protect the victims revealed by the Protected Material, the parties
18 intend to restrict access to the Protected Material in this case to the following individuals:
19 attorneys for all parties, and any personnel that the attorneys for all parties consider necessary
20 to assist in performing that attorneys' duties in the prosecution or defense of this case, including
21 investigators, paralegals, experts, support staff, interpreters, and any other individuals
22 specifically authorized by the Court (collectively, the "Covered Individuals"). The defendant,
23 Stephen Thomas Parshall, shall not review or obtain a copy of the Protected Material.

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- 1 7. Without leave of Court, the Covered Individuals shall not:
- 2 a. make copies for, or allow copies of any kind to be made by any other person
3 of the Protected Material in this case or permit dissemination of the Protected
4 Material at the Southern Nevada Detention Center jail facility, or any other
5 detention facility where the Defendant is housed, to include leaving a copy of
6 the Protected Material at any detention facility where the defendant is
7 housed;
- 8 b. allow any other person to watch, listen, or otherwise review the Protected
9 Material;
- 10 c. use the Protected Material for any other purpose other than preparing to
11 defend against or prosecute the charges in the indictment or any further
12 superseding indictment arising out of this case; or
- 13 d. attach the Protected Material to any of the pleadings, briefs, or other court
14 filings except to the extent those pleadings, briefs, or filings are filed under
15 seal.

16 8. Nothing in this stipulation is intended to restrict the parties' use or introduction of
17 the Protected Material as evidence at trial or support in motion practice.

18 9. The parties shall inform any person to whom disclosure may be made pursuant
19 to this order of the existence and terms of this Court's order.

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1 10. The defense hereby stipulates to this protective order.

2 DATED this 10th day of October, 2022.

3 Respectfully submitted,

4 For the United States:

5 JASON M. FRIERSON
6 United States Attorney

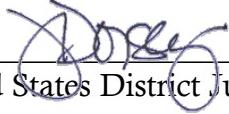
7 /s/ Bianca R. Pucci
8 BIANCA R. PUCCI
9 K. NICHOLAS PORTZ
10 Assistant United States Attorneys

For the Defense:

ROBERT M. DRASKOVICH, Jr.

/s/ Robert M. Draskovich, Jr.
Attorney for Stephen Thomas Parshall

10 IT IS SO ORDERED:

11 
12 _____
13 United States District Judge

10/11/2022

14 _____
15 Date